

EXHIBIT E

[Date]

[Name]
[Address]
[City, ST Zip]

Re: *Nevarez v. Forty Niners Football Company, LLC*, U.S. District Court, Northern District of California,
Case No. 5:16-cv-07013-LHK
Notice Regarding Your Privacy Rights

Dear [Name]:

THIS NOTICE CONCERNS YOUR PRIVACY RIGHTS

Please be advised that persons with mobility disabilities and a companion of a person with a mobility disability (hereafter “Plaintiffs”) have filed a proposed class action lawsuit in U.S. District Court, Northern District of California, against Forty Niners Football Company, LLC; Forty Niners SC Stadium Company, LLC; Forty Niners Stadium Management Company LLC; City of Santa Clara; and Santa Clara Stadium Authority (hereafter “Defendants”) on behalf of the following classes of persons:

- 1) All persons with mobility disabilities who use wheelchairs, scooters or other mobility aids who have purchased, attempted to purchase, or for whom third parties purchased accessible seating and who have been denied equal access to the Stadium’s facilities, services, accessible seating, parking, amenities, and privileges since July 17, 2014;
- 2) All persons with mobility disabilities who use wheelchairs, scooters or other mobility aids who will attempt to purchase accessible seating for a public event at Levi’s Stadium and who will be denied equal access to the Stadium’s facilities, services, accessible seating, parking, amenities, and privileges, including ticketing, during the three years prior to the filing of the Complaint herein through the conclusion of this action.
- 3) All persons who are companions of persons with mobility disabilities who use wheelchairs, scooters or other mobility aids and who have used or will use companion seating for public events located at Levi’s Stadium since July 17, 2014.

This is a Court-approved notice that provides (1) information about the case; (2) information about your privacy rights; and (3) gives you an opportunity to decline the disclosure of your contact information (*i.e.*, your home address, email address, telephone number, and cell phone number), which Plaintiffs’ attorneys are seeking as part of their investigation into this proposed class action lawsuit.

ABOUT THE LAWSUIT

Plaintiffs allege that Defendants, who own and/or operate Levi’s Stadium in Santa Clara, California have violated the Americans with Disabilities Act of 1990 (“ADA”) and California’s Unruh Civil Rights Act because the newly built Stadium and surrounding pedestrian right of way contain numerous physical access barriers that deny equal access to persons with mobility disabilities to the Stadium’s facilities, services, accessible seating, parking, amenities, and privileges, including ticketing. Plaintiffs also allege that Defendants do not provide full and equal access to seating and ticketing services for accessible and companion seating for persons with mobility disabilities and their companions. Plaintiffs seek injunctive and declaratory relief to require that Defendants fix the physical access barriers and modify their policies and practices regarding seating and ticketing services for accessible and companion seating. Plaintiffs also seek statutory damages for themselves and the proposed class members. Plaintiffs are represented by the law firms of Schneider Wallace Cottrell Konecky Wotkins LLP, Peiffer Rosca Wolf Abdullah Carr & Kane, and Goldstein Borgen Dardarian & Ho, whose contact information is provided below.

Defendants deny the allegations and maintain that they have complied with all applicable laws. Defendants are represented by Lombardi, Loper & Conant, LLP, whose contact information is provided below.

The Court has not yet made any finding as to the merits of the lawsuit, and it has not determined whether the lawsuit should proceed as a class action or if you are a member of the class.

THE PROCESS AND YOUR OPTIONS

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To complete their investigation, Plaintiffs' attorneys have requested your name and contact information (i.e., telephone number, email address and home address) so that they can conduct an investigation that may include contacting you and other consumers with mobility disabilities and/or their companions.

Defendants have not disclosed your contact information to Plaintiffs' attorneys. Instead, in acknowledgement of your privacy interests, the parties have agreed to send this letter to you to give you an opportunity to object to the release of your contact information. You have two options:

OPTION 1 (ALLOW DISCLOSURE): If you wish for your contact information (address and telephone number) to be disclosed to Plaintiffs' attorneys, you do not need to do anything.	OPTION 2 (DO NOT ALLOW DISCLOSURE): If you do NOT wish for your contact information (home address and telephone number) to be disclosed to Plaintiffs' attorneys, you must complete the enclosed pre-addressed postcard and deposit it in the mail no later than [insert date in BOLD], which is thirty (30) days from the date of this letter.
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Neither Plaintiffs' attorneys, Defendants' attorneys nor Defendants will retaliate in any way against any individual for exercising his or her legal rights, including but not limited to contacting or refusing to contact Plaintiffs' counsel and/or participating or refusing to participate in the proposed class action. Further, your decision to withhold your name and contact information at this time will have no impact on any right you may have to participate in this case in the event it is later certified as a class action.

PLEASE DO NOT CONTACT THE COURT WITH INQUIRIES

<p>Plaintiffs are represented by the law firms below:</p> <p>PEIFFER ROSCA WOLF ABDULLAH CARR & KANE Adam B. Wolf, Esq. Catherine Cabalo, Esq. 4 Embarcadero Center, 14th Floor San Francisco, CA 94111 Tel.: (415) 766-3592/Fax: (415) 402-0058 Email: awolf@prwlegal.com ccabalo@prwlegal.com</p> <p>SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNIS LLP Guy B. Wallace, Esq. Sarah Colby, Esq. Jennifer A. Uhrowczik, Esq. 2000 Powell Street, Suite 1400 Emeryville, CA 94608 Tel.: (415) 421-7100 / Fax: (415) 421-7105 Email: gwallace@schneiderwallace.com scolby@schneiderwallace.com juhrowczik@schneiderwallave.com</p> <p>GOLDSTEIN BORGEN DARDARIAN & HO Linda M. Dardarian, Esq. Andrew P. Lee, Esq. 300 Lakeside Drive, Suite 1000 Oakland, CA 94612 Tel.: (510) 763-9800/Fax: (510) 835-1417 Email: ldardarian@gdbhlegal.com alee@gdbhlegal.com</p>	<p>Defendants are represented by the law firm below:</p> <p>LOMBARDI, LOPER & CONANT, LLP Matthew S. Conant, Esq. Maria M. Lampasona, Esq. Alexei N. Offill-Klein, Esq. Lake Merritt Plaza 1999 Harrison Street, Suite 2600 Oakland, CA 94612-3541 Tel.: (510) 433-2600/Fax: (510) 433-2699 Email: msc@llcllp.com mlampasona@llcllp.com aoffillklein@llcllp.com</p>
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OPT-OUT FROM RELEASE OF CONTACT INFORMATION
[Please print all information clearly]

I DO NOT WANT my name, address, telephone number, and cell phone number provided to Plaintiffs' attorneys in connection with the lawsuit against Forty Niners Football Company, LLC, *et. al.*

Last Name

First Name

Middle Initial

Signature

Date

PLEASE NOTE: FOR THIS OBJECTION TO BE EFFECTIVE, YOU MUST COMPLETE AND MAIL IT NO LATER THAN **[INSERT DATE IN BOLD]**. IF YOU DO NOT MAIL THIS POSTCARD BY **[INSERT DATE IN BOLD]**, YOUR CONTACT INFORMATION WILL BE RELEASED TO PLAINTIFF'S ATTORNEYS.